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# **ACU STRATHFIELD CONCEPT PLAN\_ RESPONSE TO PREFERRED PROJECT REPORT SUBMISSIONS MP 10\_0231**

Prepared for Australian Catholic University  
23 October 2012

## Contact

**Silvija Smits** Principal  
ssmits@hassellstudio.com

HASELL  
Level 2  
88 Cumberland Street  
Sydney NSW  
Australia 2000  
T +61 2 9101 2000  
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HASELL Limited  
ABN 24 007 711 435

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## 1 Introduction

An Environmental Assessment (EA) report for Concept Plan approval for the Australian Catholic University (ACU) Strathfield Campus at 167 and 179 Albert Road, Strathfield was lodged with the Department of Planning and Infrastructure (DPI) on 22 December 2011. The proposal was publicly exhibited from 18 January to 29 February 2012, with a subsequent extension to 14 March 2012.

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A Preferred Project Report and Response to Submissions (PPR) was lodged with the DPI on 10 July 2012 and placed on public exhibition from 25 July to 24 August 2012. This report responds to the submissions received from the exhibition of the PPR.

The PPR received:

\_933 public submissions, and  
\_4 submissions from local and state government agencies.

Of the 933 public submissions:

\_93 (10%) were individual submissions, and  
\_840 (90%) were proforma submissions based on 3 variants.

This response to the PPR submissions addresses any new issues raised, reiterates current information provided in the PPR and also further addresses traffic and parking as they relate to proposed student numbers as requested by the DPI.

This response should be read in conjunction with the EA dated December 2011 and the PPR dated July 2012.

## 2 Summary of submissions

The PPR received 937 public and agency submissions. The issues raised can be categorised generally under the same 'key issue' headings used the PPR, although some key issues have been combined in this report.

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Submissions were received from four (4) local and NSW State Government agencies:

- \_Heritage Council of NSW
- \_Roads and Maritime Services (RMS)
- \_Sydney Water
- \_Strathfield Municipal Council

The Heritage Council comments are addressed in Section 3.4. The RMS and Sydney Water both have no objection to the proposal and have not raised any new issues to be addressed. Strathfield Council's submission raised a number of issues that are addressed throughout this report.

Public submissions numbered 933 made up of:

- \_93 individual submissions, and
- \_840 proforma submissions based on 3 variants.

The key issues addressed in this report are listed below with the percentage of submissions raising that issue in brackets:

- \_Student numbers (95%)
- \_Traffic, Parking and Access (98%)
- \_Built Form and Neighbourhood Character (9%)
- \_Heritage (1%)
- \_Residential Amenity (95%)
- \_Consultation Process (93%)
- \_Other (19%)

**Table 1** lists the key issues, identifies the section where it is discussed in this report and the topics raised in submissions that fall under that key issue.

**Table 1** – Issues raised in submissions

Key Issue	Section in Report	Topics Raised in Submissions
Student Numbers	Section 3.1	<ul style="list-style-type: none"> <li>• Impact on surrounding neighbourhood</li> <li>• ACU in breach of current consents</li> <li>• PPR does not give accurate representation of current and proposed numbers – further clarification needed</li> <li>• Equivalent full time student load (EFTSL) not best way of measuring student numbers/ environmental impacts</li> <li>• Non students (teaching staff, admin, visitors etc) should be included in counts to fully assess impacts of proposal</li> </ul>
Traffic, Parking and Access	Section 3.2	<ul style="list-style-type: none"> <li>• Local area cannot handle impacts of increase in traffic, congestion and on street parking as a result of proposal</li> <li>• Not enough on site parking proposed</li> <li>• Traffic and parking surveys not completed during a week when lectures were running</li> <li>• Increase in student numbers must result in greater parking demand and traffic movements than stated in traffic report</li> <li>• Impacts of shuttle bus increase not addressed</li> <li>• No details how sustainable transport initiatives will be encouraged/maintained</li> <li>• Gate 3 access (western end) creates potentially unsafe right-left staggered T-junction arrangement and results in loss of on-street parking</li> </ul>
Built Form and Neighbourhood Character	Section 3.3	<ul style="list-style-type: none"> <li>• Size and scale of proposal not compatible with surrounding development</li> <li>• Proposal will adversely impact on character of area</li> <li>• Over development of site</li> <li>• Non-compliance with current and draft environmental planning instruments</li> </ul>

**2\_\_\_\_ Summary of submissions**

Key Issue	Section in Report	Topics Raised in Submissions
Heritage	Section 3.4	<ul style="list-style-type: none"> <li>• Proposal will adversely impact heritage items on site</li> </ul>
Residential Amenity	Section 3.5	<ul style="list-style-type: none"> <li>• No justification for/impact of increased hours of operation</li> <li>• Sunday opening hours in breach of current consent</li> <li>• Road/ pedestrian safety</li> <li>• Litter in surrounding streets</li> <li>• Acoustic impacts – traffic, students, air conditioning etc</li> </ul>
Consultation Process	Section 3.6	<ul style="list-style-type: none"> <li>• Process does not comply with DPI 'Guidelines for Major Project Community Consultation' and 'Report of Consultation Process' not prepared</li> <li>• Attendance of residents/community at ACU organised meetings verses community organised meeting</li> <li>• Inadequate consultation as part of PPR preparation</li> </ul>
Other	Section 3.7	<ul style="list-style-type: none"> <li>• Role of religion in education</li> <li>• ACU should relocate to a new site</li> <li>• Property values</li> <li>• Relationship between ACU and St Patrick's College</li> <li>• Claims ACU has recently purchased Sydney Adventist College at 149-153 Albert Road – should be included as part of Concept Plan</li> </ul>

### 3 \_\_\_\_\_ Proponent's response to key issues

#### 3.1 Student numbers

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##### **PPR**

Student numbers were addressed in Section 3.1 of the PPR. The PPR showed that ACU are currently complying with the consents applicable to the campus in terms of student numbers in attendance on site, at any one time. The proposed future student numbers were also clarified with the distinction made between a figure for enrolled equivalent full time student load (EFTSL) and students on site at any one time. The evolution of the ways in which higher education is delivered (with increasing numbers of distance, correspondence and part-time students) has meant that the numbers of enrolments have become significantly less relevant in an assessment of environmental impacts. The significant figure in terms of an environmental assessment is the number of students on site at any one time because it is those students that have the potential to impact the relevant environment.

##### **Submissions**

Concerns about student numbers were raised in 95% of **public submissions**:

- Impact on surrounding neighbourhood
- ACU in breach of current consents
- PPR does not give accurate representation of current and proposed numbers – further clarification needed
- EFTSL not best way of measuring student numbers/environmental impacts
- Non students (teaching staff, admin, visitors etc) should be included in counts to fully assess impacts of the proposal.

**Strathfield Council** also raised the above issues.

Many of the submissions stated that the increase in students on campus 'at any one time' was a simple extrapolation of 750 to 2,000 students, a purported 167% increase. This is not correct and explained further below.

##### **Response**

###### *Impact on surrounding neighbourhood*

The PPR, in the sections on student numbers (3.1), traffic (3.2) and residential amenity 3.6), showed that the impact on the surrounding neighbourhood as a result of the proposed increase in student numbers would be manageable and not adverse. Further comment is provided in the next section of this report (3.2 Traffic, Parking and Access).

###### *Current consents*

As set out in the PPR, ACU maintains that it is in compliance with the existing consents applying to the site. Any adjustments have been made with the full knowledge of Strathfield Council. The number of students in attendance on site 'at any one time' is 750. In-class audits undertaken by ACU have demonstrated compliance with this figure.

###### *Current and proposed student numbers/EFTSL*

The most appropriate figure on which to base an environmental assessment is the student numbers on site 'at any one time', as this relates directly to those who or either physically on site, or who are coming and going each day via car, public transport or other means.

The number of enrolled students or EFTSL indicates how many students the university is educating but does not relate to the number of students coming to site because as explained in the PPR the EFTSL includes, for example distance and part-time students whose impacts are much less, if not non-existent, when compared to a full time student coming to site for all classes.

The proposed increase in student numbers on site 'at any one time' is not a simple calculation of expressing the increase at 167% based on the difference between 750 and 2,000 students.

Currently, the timetabling constraints for 750 students in attendance or in class at any one time means students can be on campus 4-5 days/week, even coming and going within a day for early and late lectures. The net result of such a constraint has led to a substantial turnover of students across the day and the week.

Historically when a smaller number of students were enrolled, those same students spent most of the day and week on campus. This is no longer the case because the nature of tertiary education has changed, as set out in the PPR. Student contact hours have been reduced, while the number of students attending the campus across the day has increased, all within the 750 'at any one time' limit.

### 3\_\_\_\_ Proponent's response to key issues

The proposed timetabling with 12 groups of up to 400 students (as shown in Table 4 in the PPR) will mean each group will be on campus only 2-3 days per week and would only come and go once from the site per day of attendance. This scenario will drastically reduce turnover or churn on site and enable the site to work more efficiently than currently, coupled with increased on-site parking and transport initiatives. In effect, the site will be better able to handle the increase in student numbers over a half-day period without a proportionate impact on the surrounding environment.

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#### *Impact of non students*

The number of teaching staff associated with the campus is 175 for the Albert Road site and uncapped for the Clancy site. It is proposed to increase the teaching staff to 260 full time equivalents by 2016. The traffic and parking assessment has included staff, students and visitors.



### 3\_\_\_ Proponent's response to key issues

#### 3.2 Traffic, parking and access

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##### **PPR**

Traffic, parking and access was addressed in Section 3.2 of the PPR and in the Transport and Accessibility Report (TAR) that accompanied the PPR. The TAR showed that the proposed increase in student numbers will not significantly increase traffic movements in the surrounding streets. It also showed that with an increase in patronage of the free shuttle bus service and extra free on site parking spaces, the number of students and staff parking in surrounding streets will decrease, even as student numbers grow.

##### **Submissions**

Traffic, parking and access concerns were raised by 98% of **public submissions**. Issues raised in public submissions and by **Strathfield Council** (in a response prepared by McLaren Traffic Engineering on behalf of Council) included:

- \_Local area cannot handle impacts of increase in traffic, congestion and on street parking as a result of proposal
- \_Not enough on site parking is proposed
- \_Traffic and parking surveys were not completed during a week when lectures were running
- \_Increase in student numbers must result in greater parking demand and traffic movements than stated in traffic report
- \_Impacts of the shuttle bus increase not addressed
- \_No details as to how sustainable transport initiatives will be encouraged/ maintained
- \_Gate 3 access (western end) creates potentially unsafe right-left staggered T-junction arrangement and results in loss of on-street parking.

The **DPI** requested further information on the following.

- \_How the proposed 2,000 students 'at any one time' will arrive at the University, in particular:
  - \_Information is to be provided on mode share targets for the proposal and how the University will achieve and maintain these targets on an on-going basis. Targets should be set for all modes of access to the site (in addition to the shuttle bus and private vehicle use), including references to students that walk, cycle or are passengers within vehicles, and
  - \_Details are sought that provide certainty that the shuttle bus modal split will be maintained at the level of patronage proposed in the PPR (the private vehicle modal split will not be increased).
- \_Clarification of the number of parking spaces allocated on-site to staff and students.
- \_Commitments are to be considered for the preparation of a Campus Travel Plan and monitoring of on-street parking and shuttle bus patronage.
- \_Further clarification is to be provided confirming the sustainable transport initiatives within the PPR.

##### **Response**

A Green Travel Plan has been prepared by ARUP and can be found at **Appendix A**. The Green Travel Plan addresses:

- \_Travel mode share targets and how 2,000 students 'at any one time' will arrive on site
- \_How the mode share targets will be met and maintained
- \_Improvements and incentives to encourage more students to travel to site via means other than private vehicles
- \_Administration of the plan which would include ongoing monitoring of how students are coming to the site.

A response to the McLaren Traffic Review is found at **Appendix B**. The review clarifies and responds to issues raised in the submission as well as the methodology.

- \_McLaren student surveys have given inaccurate numbers because of double counting. Students move between the main site and Edward Clancy during the day, as well on and off the campus as a whole. This is why in class audits are considered the best method of counting student numbers.
- \_McLaren car parking requirements and public transport usage are then based on an over exaggerated student population – giving the impression a lot more car parking spaces are needed and low patronage of public transport. The car parking requirements also do not take into account student churn, which will be significantly reduced under the proposed timetabling arrangements.

### **3\_\_\_\_\_ Proponent's response to key issues**

\_PPR TAR student audits were taken by campus operations staff are considered accurate because in class student attendance gives the best representation of students on site at any one time.

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\_Traffic generation:

\_Traffic count gate surveys taken by ARUP were taken in the last week of term. However, as the car parks on site were fully utilised, they would therefore give accurate representation of vehicles entering and leaving the site.

\_The turnover of car spaces on the campus will be greater than on-street as students attempt to utilise these spaces first. Searching for spaces on the site also increases the traffic generation at the driveways as cars enter and leave when the car parks are full. This artificially increases the traffic generation of trips per space as claimed by McLaren.

\_Concerns over the safety of access at Gate 3 are discussed with no issues raised. The intersection meets relevant safety requirements.

\_Future travel characteristics are detailed with mode share targets given for the estimated 670 students travelling to site within a peak hour.

The information requested by the DPI is addressed in the Green Travel Plan. In addition, on site parking will consist of 150 staff spaces and 567 student spaces.

### 3\_\_\_\_ Proponent's response to key issues

#### 3.3 Built form and neighbourhood character

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##### **PPR**

Built form and neighbourhood character was extensively addressed in Section 3.3 of the PPR. Amendments were made to Precincts 1 and 3 in response to concerns by the public, Strathfield Council, DPI and the Heritage Council. Amendments were also made to architectural figures throughout the EA for correction and clarification.

An architectural statement was included regarding built form and neighbourhood character and the current planning controls were also discussed. Under separate cover, Draft Local Environmental Plan 2011 (DLEP2011) was discussed.

##### **Submissions**

Built form and neighbourhood character concerns were raised by 9% of **public submissions**:

- \_Size and scale of proposal not compatible with surrounding development
- \_Proposal will adversely impact on character of area
- \_Over development of site
- \_Non-compliance with current and draft environmental planning instruments.

The submission from **Strathfield Council** (prepared by Dickson Rothschild) raised a number of issues as follows:

- \_The proposed modifications are minor and do not mitigate the unacceptable impact of bulk and scale on the surrounding low density residential area.
- \_There is ambiguity in the drawings particularly in regard to the extent of the proposed building envelopes and the nature of solids and voids proposed.
- \_Little detail given in relation to vehicular movements, access and parking. No detail given regarding car parking in each Precinct or access to basement car parking.
- \_Sections and elevations shown in respect of basement car parking proposed in Precincts 1 and 3 are inconsistent and inaccurate.
- \_Not clear if RLs for existing buildings are eave or ridge height.
- \_Bulk and scale of buildings indicate floor-to-floor heights consistent with commercial buildings, may not be appropriate for educational buildings. Heights might need to be increased at DA stage.

Council also (in a separate letter) stated the comments relating to DLEP2011 did not accurately represent submissions made during the exhibition of that document.

##### **Response**

###### *Public Submissions*

No new issues were raised by the public submissions. The analysis presented in Section 3.3 of the PPR remains relevant. Amendments were made to the design that addressed built form concerns with the proposal considered appropriate for the site and surrounds.

###### *Strathfield Council*

- \_The amendments to Precincts 1 and 3 are considered to have effectively mitigated the impacts of the bulk and scale of the proposal. Refer comments from Heritage Council.
- \_The building envelopes indicate a single means by which the target gross floor area for each precinct can be achieved. This will be finalised in separate development applications for each building, where the actual building proposed will need to be entirely within the designated envelope.
- \_Vehicle access to the site will continue to be via three gates as outlined in the PPR and Figure 4 in the TAR. Parking is to be distributed as per Table 6 in Section 3.2 of the PPR (or Table 8 in the TAR) and Figure 8 in the TAR. Access to basement car parking will be from within the site. Access to the Precinct 1 basement is indicated on Figure 4 of the TAR. Provision for access to the Precinct 3 basement will be underground connecting to the proposed new underground car.
- \_Locations for basement parking areas are indicated on the drawings in the PPR. Precinct 1 parking is shown on Section B-B and Elevation C-C instead of Section A-A while basement parking for Precinct 3 is shown on Sections A-A and B-B.
- \_The majority of RLs shown are ridge height with a small number of exceptions showing eave height as detailed in sections.

### **3\_\_\_\_\_ Proponent's response to key issues**

\_The building heights and floor-to-floor heights have been designed in close consultation with ACU and the needs of the campus. The Concept Plan identifies maximum RLs which have been nominated to achieve required clearances for educational buildings. Concern in this regard was the reason why the maximum height of Precinct 3 was marginally increased.

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#### *DLEP2011*

The majority of submissions to DLEP2011 in relation to ACU did not support the retention of the special use zone and objected to the lack of height and floor space ratio (FSR) controls within that zone. Council in response has suggested that a Planning Proposal be prepared to apply height and FSR controls to the site, consistent with adjoining residential development. A separate planning proposal is not considered necessary as an approved Concept Plan can provide height and FSR controls sought by the community.

Many of the submissions to DLEP2011 also raised issue with traffic congestion, student numbers and the scale of development on site. These issues, which are not applicable to the DLEP but rather the Concept Plan, have been addressed in the EA and PPR.

### 3\_\_\_\_ Proponent's response to key issues

#### 3.4 Heritage

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##### **PPR**

The PPR detailed amendments to Precinct 1 to address submissions to the EA. In summary, these included:

- increasing the building setback along the Albert Road alignment to maintain significant view lines and the health of the Bunya Pines, and
- reducing the height of the north western portion of the building to 3 storeys.

##### **Submissions**

Heritage concerns were raised by 1% of **public submissions**. Comments related to the proposal having an adverse impact on the heritage buildings on the site and views to items such as Mount Royal.

The submission from the **Heritage Council** generally supported the changes to the Concept Plan. Part of their response is quoted below.

*The above revisions and additional conservation management measures are generally supported as addressing the recommendations of the Heritage Council to mitigate heritage impacts.*

*The only exception is the statement of commitment for archaeology, which omits the detail of the Heritage Council's recommended conditions. To fulfil the intent of the Heritage Act's requirements for appropriate management of relics, conditions are therefore recommended for inclusion in the consolidated Part 3A consent.*

*Previously recommended conditions have been removed where these have been addressed in the response and statement of commitments as outlined above, or can be assessed in future applications.*

**Strathfield Council** make a general statement that the PPR does not maintain and/or promote the heritage character of the Strathfield Campus. Specifically Dickson Rothschild (on behalf of Strathfield Council) acknowledge the changes made to Precinct 1 but that landscaping opportunities have been reduced between Precincts 1 and 2 due to the required access to new surface car parking, opportunities that could *help soften the visual impacts of future buildings*.

##### **Response**

The PPR demonstrated that the impact on heritage items will not be detrimental. Changes were made to the Concept Plan, namely to Precinct 1 to maintain important viewlines and the setting of Mount Royal, Edmund Rice Building and Barron Chapel, and the original line of Albert Road. The changes will also protect the health of the Bunya Pines.

The Concept Plan is supported by the Heritage Council subject to conditions that can be attached to any consent.

In response to the loss of landscaping opportunity due the access road to the eastern surface car park, substantial landscaping opportunities still exist. In addition, the retention of 70 of the existing 99 car parking spaces is considered advantageous to contribute to the site's overall strategy to reduce the impacts of car parking off-site.

### 3\_\_\_\_ Proponent's response to key issues

#### 3.5 Residential amenity

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##### PPR

The PPR addressed hours of operation in Section 3.5 and safety, litter and acoustic impacts in Section 3.6. A revised Acoustic Assessment was also submitted with the PPR.

##### Submissions

Concerns relating to residential amenity were raised in 95% of **public submissions**:

- \_No justification for/impact of increased hours of operation
- \_Sunday opening hours in breach of current consent
- \_Road/ pedestrian safety
- \_Litter in surrounding streets
- \_Acoustic impacts – traffic, students, air conditioning etc.

The **DPI** requested details regarding the number of classes and students proposed on weekends.

##### Response

##### Hours of operation

The proposed marginal increase in hours of operation is to ensure the campus works as efficiently as possible. As detailed in Section 3.1.2 of the PPR (under Future Student Numbers), classes will generally be structured around two blocks of six hours (8.00am – 2.00pm and 2.00pm – 8.00pm). This will minimise student movements to and from the site within the week. Students do not only need class time so the proposed opening hours will also accommodate library time, studio time, group study and recreation opportunities.

The current operating hours (as per existing development consents) and proposed operating hours are set out in Table 3. With the exception of weekends, there is little difference.

**Table 3 – Existing and Proposed Hours of Operation**

	Existing Albert Road Site	Existing Clancy Site	Proposed (across whole campus)
Monday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Tuesday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Wednesday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Thursday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Friday	8.00am-9.00pm	8.00am – 9.00pm	7.00am – 10.00pm
Saturday	8.00am-5.00pm		8.00am – 5.00pm
Sunday			8.00am – 5.00pm

Teaching staff, service and support staff generally arrive on campus from 7.30am on weekdays, however, teaching activities are and will continue to be scheduled only between 8.00am and 8.00pm. The 8:00am class time is intended to minimise any conflict with later school start times in the area. Similarly the 2:00pm 'changeover' time occurs before school finishing times later in the afternoon. The new library building is intended to operate until 9.30pm on weekdays.

The 7:00am start time allows time for security to open the premises in the morning, while the 10:00pm closing similarly will allow for security to lock up the campus at night, which will ensure the safety and security of not only the staff and students of ACU Strathfield but also the surrounding residents.

On weekends the campus would operate from 8.00am to 5.00pm. Most student activity would involve use of the Library Learning Commons with the campus being open for study purposes for other students and the community. Across the year small postgraduate classes, of around 20 students may meet for workshops. With increased online provision the number of these weekend classes is declining. These proposed operating hours are generally consistent with Part M of Strathfield Development Control Plan which nominates *standard hours of operation for educational establishments in residential areas be limited to 7:00am to 9:30pm, Monday to Sunday*.

### 3\_\_\_\_ Proponent's response to key issues

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Submissions noted the library is currently open on Sundays. This is part of the trial change in conditions as detailed in Section 3.1.2 of the PPR. In early 2010, an increase in student numbers, small postgraduate classes on weekends and weekend library opening hours commenced with Strathfield Council's approval. These changes were to inform the preparation of the master plan for the site.

Submissions also state the traffic report has not assessed the conditions that would occur as a result of extended weekend hours. The traffic report has generally assessed the busier times (weekdays) to give the best peak picture and resulting impacts, which will be less on weekends given the small amount of classes compared to weekdays.

The extension in operating hours will not adversely impact the surrounding residential area by way of traffic movements or noise due to the hours being similar to that existing, the more efficient use of the campus and weekend use mainly involving the Library Learning Commons.

#### *Road/Pedestrian Safety*

As stated in the PPR, the minor increase in traffic movements of 3% will not affect the safety of the surrounding traffic network.

#### *Litter*

The commitments by ACU to reduce litter are reiterated. A cleaner has recently been reinstated to pick up litter around the campus perimeter and along Albert Road. A student awareness programme is run to educate students about residential amenity and not to litter in surrounding streets and a rubbish recycling system is to be implemented on campus with collection points at exit points.

#### *Acoustic impacts*

The response in the PPR remains the same, in that impacts as a result of an increase in traffic movements, an increase in student numbers and additional plant (air conditioning etc) will be minor and not adversely impact surrounding residents.

Relevant parts of the Acoustic Report (Executive Summary) submitted with the PPR are quoted below.

*The noise survey and monitoring of noise levels at the nearest residential properties around the campus established that noise levels generated by day-to-day activities on the campus are currently inaudible at the nearest residences and residential boundaries. It is anticipated that there will be little difference between teaching and non-teaching periods as the nature of the external activities on campus is such that changes in student numbers will not result in any increase in the overall noise levels at the nearest residences.*

*Similarly, whilst the increase in student numbers will increase the activity on campus, this is not expected to result in any change in the existing day-to-day noise levels around the site, nor lead to any increase in the noise impact at the nearest residences.*

*Noise from the mechanical services associated with the new buildings has been quantified and assessed against acceptability criteria derived from the NSW Industrial Noise Policy. The predicted noise levels from all plant and equipment associated with the building services comply with the criteria and no impact is anticipated. Notwithstanding this, all plant will include noise controls as required (to be determined during the design and documentation stages of the project).*

*Traffic noise criteria have been set based on the NSW Road Noise Policy. This policy was implemented on 1 July 2011 and represents the most up-to-date methodology for assessing road traffic noise in NSW.*

*Based on predicted traffic increased nominated in the traffic study carried out by Arup Pty Ltd, an increase of approximately 0.1 dBL <sub>Aeq, 1 hour</sub> is predicted for residences located along Barker Road. This increase is regarded as insignificant, will be inaudible and imperceptible, and meets the criterion of a maximum increase of 2 dBL <sub>Aeq, 1 hour</sub>.*

*No increased in existing traffic numbers, and consequently traffic noise levels, are expected for any other local roads around the campus.*

### 3\_\_\_\_ Proponent's response to key issues

#### 3.6 Consultation process

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##### **PPR**

The PPR outlines consultation on the Concept Plan in Section 3.1.2 (including a table chronologically detailing the process) and Section 3.8.2. Section 4.22 of the EA details the consultation taken prior to lodgement of the Concept Plan.

##### **Submissions**

Consultation concerns were raised by 93% of **public submissions**. Issues included:

- \_Process does not comply with DPI 'Guidelines for Major Project Community Consultation' and 'Report of the Consultation Process' not prepared
- \_Attendance of residents/community at ACU organised meetings verses community organised meeting
- \_Inadequate consultation as part of PPR preparation.

##### **Response**

The DPI 'Guidelines for Major Project Community Consultation' are *guidelines* and the EA would not have been placed on public exhibition had not the DPI considered the Director General's Requirements (DGRs) had been met, which included DGR No 20 relating to consultation.

A single 'Report of the Consultation Process' has not been produced but rather this requirement has been met with the inclusion of Section 4.22 of the EA, the preparation of the PPR and the submission of this report. All consultation details have been provided.

The proponent provided three community consultation meetings at the Strathfield Campus:

- \_11 August 2011, during the day
- \_12 August 2011, during the evening, and
- \_23 February 2012, during the evening.

To inform residents of the 2011 meetings, 220 surrounding properties were letter-box-dropped and for the 2012 meeting, 500 properties were letter-box-dropped. During exhibition periods, hard copies of the EA and supporting material, and the PPR were available at the DPI offices in the City and at Strathfield Council. The material was also available to view online on the DPI website.

The proponent organised three sessions, informing many surrounding residents they were to occur. The proponent cannot control how many people will choose to come to such sessions. The community information session organised by the community did not involve ACU and they were not invited to address the meeting.

Consultation aims to make information available to as many people as possible, in as many formats/forums as possible. The provisions detailed above confirm the proposal has met the requirements of the above Guidelines.

The preparation of the PPR does not specifically require community consultation under the Environmental Planning and Assessment (EP&A) Act. It is a report addressing submissions to the EA and can propose amendments to the Concept Plan to address submissions. It is advertised in circumstances determined appropriate by those administering the Act, in this instance DPI. Amendments are normally expected to be minor, often lessening the impact of the proposal. Changes that would be considered major/fundamental would necessitate the re-exhibition of the EA and further community consultation.

The changes made as part of the PPR were considered minor and this report addresses those further submissions on the final Concept Plan.



### 3\_\_\_\_ Proponent's response to key issues

#### 3.7 Other

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##### **PPR**

The PPR stated in Section 2.0 that a small number of issues were not discussed because they are not planning considerations. They were:

- \_the role of religion in education
- \_that ACU should relocate to a new site
- \_property values, and
- \_the relationship between ACU and St Patrick's College.

##### **Submissions**

These same concerns were raised again by 19% of **public submissions** to the PPR.

**Strathfield Council** and a small number of **public submissions** made claims that ACU had either purchased or was intending to purchase the Sydney Adventist College located at 149-153 Albert Road, which should therefore be included as part of the Concept Plan application.

##### **Response**

It is reiterated that the four concerns as listed above are not planning considerations as dictated by the EP&A Act and are not required to be addressed as part of the application.

The Sydney Adventist College site is for sale by tender, closing on 25 October 2012.

## 4 Summary and conclusion

This report addresses the submissions made to the Preferred Project Report (PPR) in response to the exhibition of the Environmental Assessment (EA) report for Concept Plan approval for the Australian Catholic University (ACU) Strathfield Campus.

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The PPR received:

\_933 public submissions, and  
\_4 submissions from local and state government agencies.

Of the 933 public submissions:

\_93 (10%) were individual submissions, and  
\_840 (90%) were proforma submissions based on 3 variants.

This report has addressed new issues raised as a result of the exhibition of the PPR, has reiterated current information provided in the PPR and also further addressed traffic and parking as they relate to proposed student numbers.

Concerns about **student numbers** were raised in 95% of public submissions. It was reiterated that the increase in student numbers up to 2016 will not have an adverse impact on the surrounding neighbourhood and that ACU are currently in compliance with consents applicable to the site in relation to the number of students on campus at any one time.

The difference between current and proposed student numbers was further explained. The simple extrapolation of 750 to 2,000 students, a purported 167% increase as made by many submissions was shown not to be the correct way to understand the increase in student numbers. The timetabling of current student numbers means students visit the site 4-5 days per week, sometime up to twice a day. With the increase in student numbers and two teaching sessions per day, students will attend the campus 2-3 days per week and remain on site for their time in attendance. This coupled with increases in public transport usage will result in reduced impacts with regard to traffic and parking than the current situation, even as student numbers increase up to 2016.

**Traffic, parking and access** concerns were raised by 98% of public submissions. The information in the PPR is reiterated in that the proposed increase in student numbers will not significantly increase traffic movements in the surrounding streets. While student numbers are increasing, as explained in the section on student numbers, churn will be reduced and therefore increases in traffic movements and parking demand will not be directly proportionate to increases in student numbers.

A Green Travel Plan (see Appendix A) has been submitted which details travel mode share targets and how 2,000 students 'at any one time' will arrive on site. It also details how the mode share targets will be met and maintained.

A response to the submission made by Strathfield Council (prepared by McLaren Traffic Engineering) can be found at Appendix B. The review clarifies and responds to issues raised in the submission as well as the methodology. McLaren have based car parking requirements and traffic generation on incorrect student number estimates because their surveys have involved double counting.

Student audits undertaken by ACU campus operations staff (and subsequent traffic and parking analysis) are considered accurate because in class student attendance gives the best representation of students on site at any one time.

Future travel characteristics are also detailed with mode share targets given for the estimated 670 students travelling to site within a peak hour.

**Built form and neighbourhood character** concerns were raised by 9% of public submissions. The built form analysis as presented in Section 3.3 of the PPR remains relevant. Amendments were made to the design, primarily to Precincts 1 and 3 which addressed concerns and the proposal is now considered appropriate for the site and surrounds.

**Heritage** concerns were raised by 1% of public submissions. As a result of submissions to the PPR, amendments to Precinct 1 were made which included: increasing the building setback along the Albert Road alignment to maintain significant view lines and the health of the Bunya Pines, and reducing the height of the north western portion of the building to 3 storeys.

## 4\_\_\_\_ Summary and conclusion

These changes addressed the concerns of the Heritage Council who now support the application.

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Concerns relating to **residential amenity** were raised in 95% of public submissions. Issues included: hours of operation, road/ pedestrian safety, litter and acoustic impacts.

The information provided in Sections 3.5 and 3.6 of the PPR remain relevant. The proposed hours of operation, during weekdays are similar to that existing with an hour increase in both mornings and evenings. Weekend opening hours are proposed across the campus, where currently only the Albert Road site is open on Saturdays. Weekend hours will be for use primarily for the library with some postgraduate classes.

The extension in operating hours will not adversely impact the surrounding residential area by way of traffic movements or noise due to the hours being similar to that existing, the more efficient use of the campus and weekend use mainly involving the Library Learning Commons.

Road/ pedestrian safety, litter and acoustic impacts will not be adverse. Traffic movements are not increasing significantly to affect safety. ACU proposes to continue collecting litter near the site and educating students not to litter and the Acoustic Report submitted with the PPR concluded noise from students, traffic and plant would not significantly impact surrounding properties.

**Consultation** concerns were raised by 93% of public submissions. They stated the process has not complied with the DPI 'Guidelines for Major Project Community Consultation' and a 'Report of the Consultation Process' was not prepared.

The PPR outlined consultation on the Concept Plan in Section 3.1.2 (including a table chronologically detailing the process) and Section 3.8.2. Section 4.22 of the EA detailed the consultation taken prior to lodgement of the Concept Plan.

Along with the submission of this report, it is considered the proponent has addressed the DPI Guidelines. A 'single' report of the consultation process has not been prepared, rather consultation has been documented throughout the Concept Plan approval process.

**Other** issues raised in submissions to the EA and PPR not addressed in this report include: the role of religion in education, ACU relocating to a new site, property values, and the relationship between ACU and St Patrick's College.

These issues were raised by 19% of public submissions and are again not addressed because they are not planning matters as dictated by the Environmental Planning and Assessment Act 1979







## **Australia**

### **Adelaide**

HASSELL  
Level 5  
70 Hindmarsh Square  
Adelaide SA  
Australia 5000  
T +61 8 8220 5000  
E [adelaide@hassellstudio.com](mailto:adelaide@hassellstudio.com)

### **Brisbane**

HASSELL  
36 Warry Street  
Fortitude Valley QLD  
Australia 4006  
T +61 7 3914 4000  
E [brisbane@hassellstudio.com](mailto:brisbane@hassellstudio.com)

### **Melbourne**

HASSELL  
61 Little Collins Street  
Melbourne VIC  
Australia 3000  
T +61 3 8102 3000  
E [melbourne@hassellstudio.com](mailto:melbourne@hassellstudio.com)

### **Perth**

HASSELL  
Podium Level, Central Park  
152 – 158 St Georges Terrace  
Perth WA  
Australia 6000  
T +61 8 6477 6000  
E [perth@hassellstudio.com](mailto:perth@hassellstudio.com)

### **Sydney**

HASSELL  
Level 2  
88 Cumberland Street  
Sydney NSW  
Australia 2000  
T +61 2 9101 2000  
E [sydney@hassellstudio.com](mailto:sydney@hassellstudio.com)

## **China**

### **Beijing**

HASSELL  
Building A7  
50 Anjialou  
ChaoYang District  
Beijing 100125 China  
T +8610 5126 6908  
E [beijing@hassellstudio.com](mailto:beijing@hassellstudio.com)

### **Chongqing**

HASSELL  
28F, International Trade Centre  
38 Qing Nian Road  
Yu Zhong District  
Chongqing 400010 China  
T +8623 6310 6888  
E [chongqing@hassellstudio.com](mailto:chongqing@hassellstudio.com)

### **Hong Kong SAR**

HASSELL  
22F, 169 Electric Road  
North Point Hong Kong SAR  
T +852 2552 9098  
E [hongkong@hassellstudio.com](mailto:hongkong@hassellstudio.com)

### **Shanghai**

HASSELL  
Building 8 Xing Fu Ma Tou  
1029 South Zhongshan Road  
Huangpu District  
Shanghai 200011 China  
T +8621 6887 8777  
E [shanghai@hassellstudio.com](mailto:shanghai@hassellstudio.com)

### **Shenzhen**

HASSELL  
37F, Landmark  
4028 Jintian Road  
Futian District  
Shenzhen 518035 China  
T +86755 2381 1838  
E [shenzhen@hassellstudio.com](mailto:shenzhen@hassellstudio.com)

## **South East Asia**

### **Bangkok**

HASSELL  
18F K Tower  
209 Sukhumvit Soi 21  
Klongtoey-Nua Wattana  
Bangkok 10110 Thailand  
T +66 2207 8999  
E [bangkok@hassellstudio.com](mailto:bangkok@hassellstudio.com)

### **Singapore**

HASSELL  
17A Stanley Street  
068736 Singapore  
T: +65 6224 4688  
E [singapore@hassellstudio.com](mailto:singapore@hassellstudio.com)

## **United Kingdom**

### **Cardiff**

HASSELL  
4<sup>th</sup> Floor James William House  
9 Museum Place  
Cardiff CF10 3BD United Kingdom  
T +44 29 2072 9071  
E [cardiff@hassellstudio.com](mailto:cardiff@hassellstudio.com)

### **London**

HASSELL  
Level 2, Morelands  
17 – 21 Old Street  
Clerkenwell  
London EC1V 9HL United Kingdom  
T +44 20 7490 7669  
E [london@hassellstudio.com](mailto:london@hassellstudio.com)